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December 27, 2013

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**BY ECF**

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The Honorable Viktor V. Pohorelsky  
United States Magistrate Judge  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *In Re Air Cargo Shipping Services Antitrust Litigation, 06-MD-1775***

Dear Judge Pohorelsky:

Please find enclosed a Stipulation and [Proposed] Order to Extend the Deadline for Asiana Airlines, Inc. ("Asiana") to Take the Rule 30(b)(6) Deposition of Korean Airlines Co., Ltd. ("Korean Airlines"). This stipulation has been agreed to by Asiana, Korean Airlines, and Plaintiffs.

As the Court is aware, under the Fifth Stipulated Revised Discovery and Class Certification Briefing Schedule, fact discovery is set to end on December 31, 2013. Asiana served a Rule 30(b)(6) notice on Korean Airlines, a Defendant to this action on December 16, 2013 to establish the foundation for admissibility of specified documents. This deposition is currently scheduled to take place on December 30, 2013.

Counsel for Korean Airlines has advised counsel for Asiana that given the holidays and the timing of the deposition notice, Korean Airlines will be unable to produce a witness on December 30, 2013. Counsel for Korean Airlines have further agreed to meet and confer with Asiana to attempt to agree upon a stipulation or declaration that would otherwise obviate the need for a deposition. Accordingly, the parties have met and conferred, and agreed, subject to the Court's approval, to extend the discovery deadline as set forth in the enclosed stipulation and proposed order.

Thus, Asiana, with the consent of Korean Airlines and Plaintiffs, respectfully requests that the Court enters the attached Stipulation and [Proposed] Order to Extend the Deadline for Asiana Airlines, Inc. to Take the Rule 30(b)(6) Deposition of Korean Airlines Co., Ltd.

† In association with Tumbuan & Partners

O'MELVENY & MYERS LLP

December 27, 2013 - Page 2

Sincerely,

/s/ Ian Simmons

Ian Simmons

Enclosure

cc: All parties (via ECF)

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

IN RE AIR CARGO SHIPPING SERVICES  
ANTITRUST LITIGATION

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINE  
FOR ASIANA AIRLINES, INC. TO TAKE THE RULE 30(B)(6) DEPOSITION  
OF KOREAN AIRLINES CO. LTD**

WHEREAS the Fifth Stipulated Revised Discovery and Class Certification Briefing Schedule (as ordered by the Court on March 6, 2013) set a deadline of December 31, 2013 by which fact discovery would end;

WHEREAS on December 16, 2013, Asiana Airlines, Inc. (“Asiana”) served a Rule 30(b)(6) deposition notice on Korean Airlines Co., Ltd. (“Korean Airlines”) to establish the foundation for admissibility of specified documents;

WHEREAS the deposition of Korean Airlines is currently scheduled for December 30, 2013;

WHEREAS counsel for Korean Airlines has advised counsel for Asiana that given the holidays and the timing of the deposition notice, Korean Airlines will be unable to produce a witness on December 30, 2013; and

WHEREAS counsel for Korean Airlines and counsel for Asiana have agreed to meet and confer to attempt to agree upon a stipulation or declaration that would obviate the need for a deposition;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned, that:

The deadline for the parties to take the aforementioned deposition of Korean Airlines shall be extended until March 31, 2014 for the purpose of allowing counsel for Korean Airlines and counsel for Asiana time to negotiate in good faith a mutually agreeable declaration or stipulation that would suffice to establish the foundation for admissibility of the documents specified in the deposition notice.

Dated: December 27, 2013

Respectfully submitted,

By: /s/ Ian Simmons  
Ian Simmons

Ian Simmons  
Benjamin G. Bradshaw  
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*/s/ Jeremy Evans*  
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*/s/ Gregory K. Arenson*  
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Counsel for PLAINTIFFS

**CERTIFICATE OF SERVICE**

I, Ian Simmons, hereby certify that on December 27, 2013, I caused a true and correct copy of the Letter Motion by Asiana Airlines, Inc., and Stipulation and [Proposed] Order to Extend the Deadline for Asiana Airlines, Inc. to Take the Rule 30(b)(6) Deposition of Korean Airlines Co., Ltd. to be served via the Court's ECF system to all attorneys of record in this action.

/s/ Ian Simmons

Ian Simmons